

Mark C. Mao (SBN 236165)
mmao@bsfllp.com
BOIES SCHILLER FLEXNER LLP
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293-6800
Facsimile: (415) 293-6899

Menno Goedman (SBN 301271)
mgoedman@bsfllp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington, DC 20005
Telephone: (202) 237-2727
Facsimile: (202) 237-6131

*Attorneys for Plaintiffs
Ripple Labs Inc. and Bradley Garlinghouse*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RIPPLE LABS INC. & BRADLEY
GARLINGHOUSE,

Plaintiffs,

v.

YOUTUBE, LLC,

Defendant.

Case No. 3:20-cv-2747-LB

**STIPULATED REQUEST TO
EXTEND MOTION TO DISMISS
BRIEFING SCHEDULE**

Civil Local Rule 6-2

Magistrate Judge Laurel Beeler

Under Rule 6-2 of the Local Rules of the United States District Court, Northern District of California, Plaintiffs Ripple Labs Inc. and Bradley Garlinghouse and Defendant YouTube, LLC hereby stipulate to and request an extension of the briefing schedule for Defendant's Motion to Dismiss, currently pending before the Court.

1. On April 21, 2020, Plaintiffs filed and served the instant Complaint against Defendant alleging violations of the Lanham Act, California's statutory and common law right of publicity, and California's Unfair Competition Law. Dkt. 1. By stipulation of the parties, Defendant's deadline to respond to the Complaint was extended three times. Dkt. 16, 19, 23. On July 20, 2020, Defendant filed a Motion to Dismiss. Dkt. 26. The current deadline for Plaintiffs to oppose the Motion is August 3, 2020. *Id.* Defendant's reply brief, if any, is due August 10, 2020. A hearing on the Motion was noticed for August 27, 2020. *Id.*

2. Plaintiffs and Defendant stipulate to and request the following extension of these deadlines:

- Plaintiffs' deadline to file an Opposition to the Motion to Dismiss is extended from August 3, 2020 to September 7, 2020;
- Defendant's deadline to file a Reply, if any, in support of the Motion to Dismiss is extended from August 10, 2020 to September 28, 2020; and
- The hearing date for the Motion is moved from August 27, 2020 to October 22, 2020.

3. The extension is necessary to enable the parties to continue exploring a potential settlement and because the issues raised in Defendant's Motion are complex.

4. The requested extension would not alter any deadline already fixed by the Court. The only such deadline is the Case Management Conference, currently scheduled for October 22, 2020. Dkt. 25. The Motion will be fully briefed prior to the Conference and, if acceptable to the Court, the parties propose to have the Motion heard on the same date as the Conference.

//

//

//

1
2 Dated: July 29, 2020

BOIES SCHILLER FLEXNER LLP

3
4 By: /s/ Menno Goedman

Menno Goedman
mgoedman@bsflp.com

6 *Attorneys for Plaintiffs*

7 Dated: July 29, 2020

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

9
10 By: /s/ Brian M. Willen

Brian M. Willen
dkramer@wsgr.com

11
12 *Attorneys for Defendant*

13
14 Pursuant to the foregoing stipulation, **IT IS SO ORDERED.**

15
16 Dated: July 29, 2020



17
18
19
20
21
22
23
24
25
26
27
28

Laurel Beeler
UNITED STATES MAGISTRATE JUDGE

SIGNATURE ATTESTATION

21 I, Menno Goedman, hereby attest that all other signatories listed, and on whose behalf the
22 filing is submitted, concur in the filing's content and have authorized its filing.

23
24 By: /s/ Menno Goedman

Menno Goedman